

# CHARGE OF DISCRIMINATION

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AGENCY

☐ FEPA  
☒ EEOC

CHARGE NUMBER

E-09/16-47250  
28E-2016-01787

## Missouri Commission on Human Rights

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Jean Morris

HOME TELEPHONE (Include Area Code)

816 616 5118

STREET ADDRESS

9212 Washington Street

CITY, STATE AND ZIP CODE

Kansas City, MO 64114

DATE OF BIRTH

REDACTED

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

Cox Enterprises Inc.

NUMBER OF EMPLOYEES, MEMBERS

100+

TELEPHONE (Include Area Code)

STREET ADDRESS

3003 Summit Blvd. Ste 200

CITY, STATE AND ZIP CODE

Atlanta, GA 30319

COUNTY

NAME

Cox Automotive Inc. and Autotrader.com

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

3003 Summit Blvd. Ste 200

CITY, STATE AND ZIP CODE

Atlanta, GA 30319

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☒ AGE  
☒ RETALIATION ☐ NATIONAL ORIGIN ☐ DISABILITY ☐ OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE

EARLIEST (ADEA/EPA)

LATEST (ALL)

July 2015

July 29, 2016

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I was employed by respondents for 9 years as an advertising consultant. My sales territory included Kansas and Missouri but was Missouri at the time of termination. In July of 2015 my supervisor, Mark Keller, asked if I would help cover an open territory after a colleague left the company. I agreed to do so and was looking forward to the opportunity. That same evening, my colleague Cassie Bajpeyi called me and asked about my meeting with Mark. I informed her of the additional territory I will be covering. She essentially threw a fit on the phone and said she wanted the territory. Ms. Bajpeyi is approximately 30 years old. I am 55 years old. Mark Keller, took the open territory away from me and gave it to Ms. Bajpeyi. Thereafter in September, October and November, Mr. Keller and the new regional sales director, Andy Lorenz, begin to reallocate my territory. My most profitable territories were given to Ms. Bajpeyi. At about this same time, another older female employee was also informed that she would be losing most of her territory. When Ms. Bajpeyi was given my territory I was then given her less desirable territory. Some of the accounts informed me that they did not want Ms. Bajpeyi to service them however the requests were ignored by upper level management. Mr. Keller also took accounts suffering neglect by Ms. Bajpeyi and that were in pending cancellation and transferred them to me without consultation or communication so that I would suffer the revenue loss instead of Ms. Bajpeyi. In December of 2015, I reported the discrimination. That same month I was put on a written warning and performance improvement plan by Mr. Keller. I made a written complaint of discrimination to HR at the end of February 2016. I also made a complaint about unethical conduct by Andy Lorenz. In the Spring of 2016 Andy Lorenz was fired for the violations I reported. Andy Lorenz and Mark Keller were close. Mark Keller was angry about my role in the termination of Mr. Lorenz in addition to my complaints of discrimination. In the Spring of 2016 I made my 2<sup>nd</sup> quarter goal by 140% and received a bonus. Yet in June of 2016, just months after my written complaint of discrimination and complaints of unethical conduct, I was put on a final written warning. I was

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Date 9/19/16  
Charging Party (Signature) Jean Morris

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(Day, month, and year)

SEP 20 2016  
Missouri Commission on Human Rights  
Jefferson City Office

also being held to standards that others were not. At the end of July 2016, Mark Keller terminated my employment. I believe I was terminated as part of the company's pattern and practice of age and gender discrimination. I also believe my termination was in retaliation for my complaints of discrimination and unethical conduct. Ms. Bajpeyi has flirted with customers to the point that she has been asked not to handle an account. She constantly flirts with Mark Keller and behaves inappropriately yet she remains employed. As a result of the company's discriminatory and retaliatory conduct, I have suffered and will continue to suffer emotional distress and lost wages.

**FILED**

**SEP 20 2016**

MO Commission on Human Rights  
Jefferson City Office